REMARKS

Claims 1-14, 16-21, and 23-54 are pending. The Examiner allows claims 19-21, 23 and 25-54. The Examiner objects to claims 2, 4-5, 10-14 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. The Examiner objects to claims 1 and 23 for a variety of informalities. The Examiner rejects claims 1, 6, 8, 9, 17 and 24 under 35 USC §102(e) as anticipated by U.S. Patent No. 6,072,794 to Kang. The Examiner rejects claims 3, 7, 16 and 18 under 35 USC §103(a) as anticipated by Kang in view of U.S. Patent No. 6,434,161 to Higbee. Applicants amend claims 1, 2, 10, 11, 14, 17, 23, and 24. Claims 1-14, 16-21, and 23-54 remain in the case. Applicants add no new matter and request reconsideration.

Status of the Application

Applicants respectfully request that the finality of the Office Action be withdrawn. The Examiner has submitted a new reference (Kang) and argued new grounds of rejection for claims 17 and 24. These new grounds of rejection were not necessitated by an amendment, as claims 17 and 24 were amended to place them into independent form. Since the rewriting of dependent claims into independent form adds no new limitations, subject-matter, or even punctuation, the Examiner could have presented this new reference and new grounds of rejection for claims 17 and 24 in one or more of the previous Office Actions. The new grounds of rejection therefore were not necessitated by the rewriting of claims 17 and 24 into independent form. Accordingly, Applicants submit that the finality of the instant Office Action is premature under MPEP 706.07(a), and requests that the finality of the instant Office Action be withdrawn under MPEP 706.07(d).

Allowable Subject Matter

Applicants thanks Examiner Pizarro for the allowance of claims 19-21, 23 and 25-54. The Examiner objects to claims 2, 4-5, 10-14 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Applicants have elected to rewrite claims 2, 10, 11, and 14 into independent form to place claims 2-5, and 10-14 in condition for allowance.

Claim Objections

The Examiner objects to claims 1 and 23 for a variety of the informalities. Applicants amend claims 1 and 23 to obviate the Examiner's objections.

Claim Rejections – 35 USC §102 & §103

The Examiner rejects claims 1, 6, 8, 9, 17 and 24 under 35 USC §102(e) as anticipated by Kang. The Examiner rejects claims 3, 7, 16 and 18 under 35 USC §103(a) as anticipated by Kang in view of Higbee. Applicants respectfully traverse the Examiner's rejections.

Claim 1 recites *a plurality of framer farms adapted to generate a corresponding plurality of event signals, where the event signals are to request service for corresponding framer farms*. According to the Examiner, Kang's line cards 310 or 410 disclose the recited framer farms. The Examiner alleges Kang's link state signals LSS disclose the recited event signals. The link state signals LSS, however, provide trunk state information to Kang's processor 250 for use in selecting a reference clock, not to *request service for* the line card 310 or 410 as recited. Kang, col. 6, lines 52-58. That the line cards 310 or 410 are synchronized with a network synchronized system clock that is generated in-part with the reference clock does not obviate the fact that link state signals LSS do not request service for *corresponding* line cards 310 or 410. Kang, therefore, does not anticipate claim 1 or its corresponding dependent claims.

Claim 1 further recites *an event manager adapted to sequence the plurality of event signals*. According to the Examiner, Kang's link state signals LSS disclose the recited event signals. The Examiner appears to allege Kang's processor 250 discloses the recited event manager. There is no disclosure in Kang, however, of any sequencing of the link state signals LSS, much less by the processor 250 as the claim requires. Kang further provides no motivation to sequence its link state signals LSS, as the processor 250 generates a control signal according to *all* of the received link state signals LSS. Kang, therefore, does not anticipate claim 1 or its corresponding dependent claims.

Claim 17 recites *an event queue adapted to queue a plurality of event signals, one or more framer farms generating the corresponding event signals*. Claims 6 and 24 recite similar limitations. According to the Examiner, Kang's line cards 310 or 410 and link state signals LSS disclose the recited framer farms and the event signals, respectively. The Examiner alleges Kang's memory 515 within R2 signaling part 230 discloses the recited event queue. There is no disclosure in Kang, however, of the R2 signaling part 230 receiving

the link state signals LSS, much less queuing the link state signals LSS within memory 515. In other words, since the memory 515 does not store *any signals generated* by Kang's line cards 310 or 410, Kang does not disclose the recited event queue. Kang, therefore, does not anticipate claim 6, 17, or 24, and their corresponding dependent claims.

Claim 17 further recites *a status register adapted to maintain a status of each of the plurality of event signals*. Claim 24 recites a similar limitation. Claim 6 recites *a status register adapted to maintain a status of the event queue*. The Examiner alleges Kang's register 519 within R2 signaling part 230 discloses the recited status register. The register 519, however, stores signaling information extracted from trunk line data, which is separate and distinct from the recited maintaining of the status of the link state signals LSS and memory 515. Since nothing in Kang teaches or suggests maintaining the status of the memory 515 or any signal generated by Kang's line cards 310 or 410, Kang does not anticipate claim 6, 17, or 24, and their corresponding dependent claims.

Claim 17 recites *the event register comprises a framer farm identification field to identify one or more framer farms generating the corresponding event signals*. Claim 24 recites a similar limitation. The Examiner appears to allege Kang's DSP 517 discloses the recited event register. The Examiner further alleges Kang's High Density Bipolar Order 3 (HDB3), Alternate Mark Inversion (AMI), and Bipolar with 8 Zeros Substitution (B8ZS) encoding methods disclose the recited framer farm identification field. The AMI, B8ZS, and HDB8 encoding methods, however, are methods for encoding T1 and E1 transmissions to ensure they do not include too many consecutive zeros, and thus do not disclose the recited *fields* within the DSP 517. Kang further does not teach or suggest including any fields within its DSP 517, much less the recited framer farm identification field identifying line cards 310 or 410 having generated link state signals LSS. Kang, therefore, does not anticipate claim 17, or 24, and their corresponding dependent claims.

CONCLUSION

For the foregoing reasons, reconsideration and allowance of the claims of the application as amended is solicited. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted,

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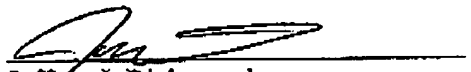

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